

LAW OFFICES OF KENNETH L. BAUM LLC

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Educational Credit Management Corporation

In re:

KEVIN JARED ROSENBERG,

Debtor.

CASE NO. 18-35379-cgm

Chapter 7

KEVIN JARED ROSENBERG,

Plaintiff,

ADV. PRO. NO. 18-09023-cgm

v.

**Hearing Date: October 29, 2019, at 10:00
a.m.**

NY STATE HIGHER EDUCATION
SERVICES CORPORATION, YESHIVA
UNIVERSITY, ACCESSLEX INSTITUTE
d/b/a ACCESS GROUP, and
EDUCATIONAL CREDIT
MANAGEMENT CORPORATION,

Defendants.

Objection Deadline: October 22, 2019

**NOTICE OF DEFENDANT, EDUCATIONAL CREDIT MANAGEMENT
CORPORATION'S CROSS-MOTION FOR SUMMARY JUDGMENT
PURSUANT TO FED. R. CIV. P. 56 AND LBR 7056-1**

PLEASE TAKE NOTICE that a hearing on the annexed Cross-Motion, dated October 8, 2019 (the "Cross-Motion"), of Educational Credit Management Corporation ("ECMC"), for an order granting ECMC summary judgment in the above-captioned adversary proceeding pursuant to Fed. R. Civ. P. 56 and LBR 7056-1, will be held before the Honorable Cecelia G. Morris, Chief United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern

District of New York, 355 Main Street. Poughkeepsie, New York 12601-3315 (the “Bankruptcy Court”), on October 29, 2019, at 10:00 a.m. (Eastern Time), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that opposition, if any, to the Cross-Motion must:

- (a) be in writing; (b) comply with the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York; (c) set forth the basis for the objection; (d) be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s case filing system and, by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Judge Morris’ chambers); and (e) be served so that it is RECEIVED **no later than October 22, 2019** (the “Objection Deadline”), by counsel for ECMC, Law Offices of Kenneth L. Baum LLC, 167 Main Street, Hackensack, New Jersey 07601 (Attn.: Kenneth L. Baum, Esq.).

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the Cross-Motion, ECMC may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Cross-Motion, which order may be entered with no further notice or opportunity to be heard.

Dated: Hackensack, New Jersey
October 8, 2019

LAW OFFICES OF KENNETH L. BAUM
LLC
Attorneys for Defendant, Educational Credit
Management Corporation

By: /s/ Kenneth L. Baum
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